



### Preserving Great Taste

7 Great North Road, Parry Sound, Ontario P2A 2X8 Canada  
Producers of Premium Fruit Products  
croftersorganic.com

Date: August 8, 2005

Arthur Neal, Director, Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave., SW., Room 4008  
So. Ag Stop 0268  
Washington, DC 20250

Via E-mail: [National.List@usda.gov](mailto:National.List@usda.gov)  
Via Fax: (202) 205-7808

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Crofters Food Ltd. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

**Calcium hydroxide**, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is a processing aid in the production of organic cane sugar.

Crofters currently uses organic cane sugar to produce organic Jams, Fruit Preserves, Fruit Spreads and Fruit Preparations for addition to yogurt and ice cream mixes. Crystalline sugar of adequate quality cannot be produced without the use of calcium hydroxide, since there is no suitable alternative processing aid. Being a basic ingredient and the most versatile sweetener with unique flavour-neutral and pectin reactivity characteristics, organic cane sugar (made with calcium hydroxide) is essential in our formulations without which we would not be able to produce our Jams, Fruit Preserves, Fruit Spreads and Fruit Preparations.

In addition, please note that calcium hydroxide is permitted for use in the production of organic sugar under European Union regulation number 2092/91. The removal of calcium hydroxide from the National List and the resulting incompatibility between organic standards would all but eliminate the export of "organic", sugar-containing products to the EU, the largest market for US produced multi-ingredient products.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerhard Latka".

Gerhard Latka  
President

